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Mark Sievers, Chairman  
Ward Loyd, Commissioner  
Thomas E. Wright, Commissioner

Sam Brownback, Governor

September 26, 2011

Marlene H. Dortch

Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Room TW – A306  
Washington, DC 20554

Karen Majcher  
Vice President, High Cost & Low Income Division  
Universal Service Administration Company  
2000 L Street, NW, Suite 200  
Washington, DC 20035

RE: Rate Comparability Review and Certification for Areas Served by Non-Rural Areas  
*In the Matter of the Federal-State Joint Board on Universal Service, CC Docket No. 96-45*

To the Filing Representatives:

This letter serves as the Kansas Corporation Commission's (KCC) certification that the KCC has determined residential rates in rural areas of Kansas served by Southwestern Bell Telephone L.P. (d/b/a AT&T Kansas), Kansas' non-rural incumbent local exchange carrier, are reasonably comparable to urban rate nationwide, for purposes of Section 254(b)(3) of the Telecommunications Act of 1996, as shown on Attachment 1, to this letter.

As required by 47 C.F.R. 54.316(d), the KCC notes that as of July 1, 2011, local service rates for AT&T Kansas were \$15.70 in rate groups 1-4. When end user common line charge (EUCL), Federal and Kansas universal service fund assessments, taxes, 911 assessments, and other charges are included, the monthly rural rate totals \$28.06 for rate groups 1-4. The rates are below the urban benchmark of \$32.03 established by the FCC.

If you have any questions, please don't hesitate to contact the KCC.

Yours truly,

Mark Sievers, Chairman  
Kansas Corporation Commission

MS: hgb

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**Docket 11-GIMT-837-GIT**  
**Southwestern Bell Telephone Company d/b/a AT&T Kansas ("SWBT")**  
**Rates as of 7/1/2011**

Rate Group	UNE Zone 1-Rural 2-Suburban 3-Urban	Monthly Residential Flat-Rate Service (incl Touchtone) [Note 1]	EUCL	FUSF	KUSF	Taxes, 911 and Other Charges [Note 2]	Total Monthly charge for Flat-Rate Service
1	1	\$ 15.70	\$ 5.30	\$ 0.76	\$ 2.04	\$ 4.26	\$ 28.06
2	1	\$ 15.70	\$ 5.30	\$ 0.76	\$ 2.04	\$ 4.26	\$ 28.06
3	1	\$ 15.70	\$ 5.30	\$ 0.76	\$ 2.04	\$ 4.26	\$ 28.06
4	2	\$ 15.70	\$ 5.30	\$ 0.76	\$ 2.04	\$ 4.26	\$ 28.06
Average Rate for Rural Rate Groups (RG 1-4)							<u>\$ 28.06</u>
5	3	\$ 15.70	\$ 5.30	\$ 0.76	\$ 2.04	\$ 4.26	\$ 28.06
6	3	\$ 16.70	\$ 5.30	\$ 0.76	\$ 2.04	\$ 4.26	\$ 29.06
7	3	\$ 16.70	\$ 5.30	\$ 0.76	\$ 2.04	\$ 4.26	\$ 29.06
8	3	\$ 16.70	\$ 5.30	\$ 0.76	\$ 2.04	\$ 4.26	\$ 29.06
Average Rate for Urban Rate Groups (RG 5-8)							<u>\$ 28.81</u>

[1] Residential rates per SWBT's Local Exchange Tariff, 16th Revised Sheet 16.

[2] Used average "Taxes, 911 and Other Charges" from FCC analysis of "Residential Rates for Local Service in Urban Areas", Table 1.1 of FCC Reference Book for 2008 issued August 28, 2008 (most current FCC Reference Book).